

Qwest.

Spirit of Service

Qwest
1700 Fifteenth Street NW Suite 700

Washington, DC 20036
Phone 202 429 3120
Facsimile 202 293 0561

EX PARTE OR LATE FILED
Melissa E. Newman
Vice President Federal Regulatory

ORIGINAL

April 22A, 2003

EX PARTE

RECEIVED

REDACTED - FOR PUBLIC INSPECTION

APR 22 2003

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**Re: WC Docket No. 03-90 - Application by Qwest Communications
International Inc. for Authority to Provide In-Region InterLATA
Services in the State of Minnesota**

Dear Ms. Dortch:

Qwest Communications International Inc. ("Qwest") submits this letter at the request of Commission staff to update the record in connection with (1) perceived reject rate increases in January 2003 and during the early part of this year; (2) overall reject rates following Qwest's recent implementation of "Migrate-by-TN" and "Migrate-as-Specified" functionality in EDI version 12.0; and (3) Qwest's manual service order accuracy in Minnesota.

Perceived Reject Rate Increases

In January 2003, regional rates for LSRs submitted via EDI that were auto-rejected (as measured by PID PO-4B-2) increased relative to previous months. In investigating this issue, Qwest found that a CLEC (***) implemented a new release of its EDI interface in January that contained an error that resulted in over 30,000 rejects that month. This error accounted for approximately 80% of all CLEC LSRs rejected that month, which caused a sudden spike in the overall reject rate in January. Although the CLEC in question subsequently corrected this error in its software, the regional reject rate under PO-4B-2 did not decline to pre-January 2003 levels because a different CLEC (***) went into production in January using its EDI interface and experienced a high volume of rejects (over 21,000) in February. This caused Qwest's overall reject rates under PO-4B-2 to remain above December 2002 levels.

Commission staff asked about two CLECs (***) that appear to have experienced high reject rates in the early part of this year. With respect to one of these CLECs (***) , its reject rates may have been high in January because it was in Controlled Production for most of that month. Qwest suspects that this CLEC's reject rate declined in February because that CLEC corrected certain errors that came to its attention during Controlled Production, but Qwest cannot know this for certain because this type of information resides with the CLEC alone. Regardless, based on preliminary data, the CLEC's reject rate is expected to have declined substantially once the CLEC implemented a fix to its EDI interface on ***. With respect to the other CLEC identified by staff that experienced high reject rates during the early part of this year (***) , these rates cannot be considered statistically significant because only three LSRs were submitted by this CLEC via EDI in January and February combined.

Reject Rates Following EDI 12.0

On April 7, 2003, Qwest began to provide CLECs with "Migrate-by-TN" and "Migrate-as-Specified" functionality through the implementation of IMA version 12.0. As of the date of this writing, no CLEC has completed the testing necessary to migrate to the latest EDI release associated with version 12.0. Reject rate data for CLECs using EDI version 12.0 therefore is not available.

Manual Service Order Accuracy

Qwest's manual service order accuracy is reported under PID PO-20. Results for PO-20 are reported at a regional, not state-specific, level, but the sampling that is performed to assess Qwest's performance under the PID includes orders for services provisioned in Minnesota. Qwest's results under PO-20 demonstrate that Qwest can – and indeed does – manually process service orders accurately. Specifically, under PO-20, Qwest accurately processed over 90% of all manual service orders since the company began reporting the measure in June 2002, and has achieved manual service order accuracy rates in excess of 95% in 13 of the 18 opportunities (two sub-measures per month) reported since that time.

* * *

See Confidential Attachment A

Notably, this same CLEC saw a decline in its reject rates starting in January 2003 for LSRs submitted via the IMA-GUI interface.

See Minnesota Commercial Performance Results at 102 (PO-20).

Marlene H. Dortch
April 22A, 2003
Page 3

The twenty-page limit does not apply to this filing. Please contact the undersigned if you have any questions concerning this submission.

Respectfully submitted,

/s/

Melissa Newman

cc: G. Cohen
J. Myles
G. Remondino
R. Harsch
B. Harr

ATTACHMENT A

REDACTED -- FOR PUBLIC INSPECTION

IF LIE yy	CD_271D	PROD-CD	_NAME_	-LABEL-
3-Feb	PO-4B-2	CRM-AGG	NUM	Numerator of Metric
3-Feb	PO-4B-2	CRM-AGG	DENOM	Denominator of Metric
3-Feb	PO-4B-2	CRM-AGG	RESULT	Metric Result Value
3-Jan	PO-4B-2	CRM-AGG	NUM	Numerator of Metric
3-Jan	PO-4B-2	CRM-AGG	DENOM	Denominator of Metric
3-Jan	PO-4B-2	CRM-AGG	RESULT	Metric Result Value
2-Dec	PO-4B-2	CRM-AGG	NUM	Numerator of Metric
2-Dec	PO-46-2	CRM-AGG	DENOM	Denominator of Metric
2-Dec	PO-4B-2	CRM-AGG	RESULT	Metric Result Value
2-Nov	PO-46-2	CRM-AGG	NUM	Numerator of Metric
2-Nov	PO-4B-2	CRM-AGG	DENOM	Denominator of Metric
2-NOV	PO-4B-2	CRM-AGG	RESULT	Metric Result Value
2-Oct	PO-46-2	CRM-AGG	NUM	Numerator of Metric
2-Oct	PO-46-2	CRM-AGG	DENOM	Denominator of Metric
2-Oct	PO-4B-2	CRM-AGG	RESULT	Metric Result Value
2-Sep	PO-4B-2	CRM-AGG	NUM	Numerator of Metric
2-Sep	PO-48-2	CRM-AGG	DENOM	Denominator of Metric
2-Sep	PO-4B-2	CRM-AGG	RESULT	Metric Result Value

TWO PAGES TOTAL REDACTED